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Attorneys for Defendant

Additional Counsel Listed on Signature Page

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KIMBERLY MAIN, an individual, on behalf
of herself and all others similarly situated,

Plaintiff,

v.

WAL-MART STORES, INC., and DOES 1
through 50, inclusive,

Defendants.

Case No. C 11-01919 JSW

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER RE CONSOLIDATION OF ACTIONS
AND CONSOLIDATED COMPLAINT**

Hon. Jeffrey S. White
Courtroom 11, 19th Floor

ROBIN NELSON, an individual, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

WAL-MART STORES, INC., and DOES 1
through 50, inclusive,

Defendants.

Case No. C 11-02001 JSW

MARYLYNN GRIKAVICIUS, an individual,
on behalf of herself and all others similarly
situated,

Plaintiff,

v.

WAL-MART STORES, INC., and DOES 1
through 50, inclusive,

Defendants.

Case No. C 11-02893 JSW

LOURDES R. LANDEROS, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

v.

WAL-MART STORES, INC., and DOES 1
through 50, inclusive,

Defendants.

Case No. C 11-02659 JSW

TINA BAUER, an individual, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

WAL-MART STORES, INC., and DOES 1
through 50, inclusive,

Defendants.

Case No. C 11-03233 JSW

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1 Plaintiffs Kimberly Main, Robin Nelson, Marylynn Grikavicius, Lourdes R. Landeros,
 2 and Tina Bauer ("Plaintiffs") and defendant Wal-Mart Stores, Inc., by and through their
 3 respective counsel, jointly submit the following Stipulation regarding consolidation of the above-
 4 referenced actions for all purposes and the filing of Plaintiffs' consolidated complaint on or
 5 before December 9, 2011.

6 **RECITALS**

7 **WHEREAS**, this Court has issued Orders relating each of the above-captioned cases (*Main*
 8 *v. Wal-Mart Stores, Inc.*, Case No. C 11-01919; ECF Doc. Nos. 14, 17, 28, 29);

9 **WHEREAS**, the parties agree that the above-referenced actions should be consolidated for
 10 all purposes because it will promote the interests of judicial economy and efficiency;

11 **WHEREAS**, the parties agree that Plaintiffs should file a consolidated complaint; and

12 **WHEREAS**, Plaintiffs agree that Stonebarger Law, APC, and Westrup Klick LLP, shall
 13 serve as Co-Lead Plaintiffs' Counsel once the above-referenced actions are consolidated.

14 **STIPULATION**

15 **NOW, THEREFORE, IT IS STIPULATED AND AGREED**, by the parties, through their
 16 respective counsel of record, that (1) the above-referenced actions shall be consolidated for all
 17 purposes, (2) Plaintiffs shall file a consolidated complaint on or before December 9, 2011, (3)
 18 Stonebarger Law, APC, and Westrup Klick LLP, shall serve as Co-Lead Plaintiffs' Counsel once
 19 the above-referenced actions are consolidated, whereby Co-Lead Plaintiffs' Counsel will be
 20 responsible for directing work to be performed by Plaintiffs' counsel on behalf of the putative
 21 class, for the preparation of any documents to be filed with the Court, and for communications
 22 with the Court and Defense Counsel, and (4) this stipulation shall not alter the time within which
 23 the parties shall make their initial disclosures or respond to discovery requests that were
 24 propounded prior to entry of the order made pursuant to this stipulation.

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1 IT IS SO STIPULATED.

2
3 Dated: November 16, 2011

REED SMITH LLP

4
5 /s/Abraham J. Colman

Abraham J. Colman

6 Scott H. Jacobs

Brandon W. Corbridge

7 Attorneys for Defendant

8 WAL-MART STORES, INC.

9
10 Dated: November 16, 2011

PATTERSON LAW GROUP, APC

11
12 /s/James R. Patterson

James R. Patterson

13 Matthew J. O'Connor

402 West Broadway, 29th Floor

14 San Diego, CA 92101

15 Attorneys for Plaintiff Kimberly Main

16
17 Dated: November 16, 2011

STONEBARGER LAW, APC

18
19 /s/Gene J. Stonebarger

Gene J. Stonebarger

20 Richard D. Lambert

75 Iron Point Circle, Suite 145

21 Folsom, CA 95630

22 Attorneys for Plaintiff Robin Nelson

23
24
25 ///

26
27 ///

1 Dated: November 16, 2011

WESTRUP KLINK LLP

3
4 /s/Mark L. VanBuskirk

Mark L. VanBuskirk
R. Duane Westrup
444 W. Ocean Blvd., Suite 1614
Long Beach, CA 90802-4524

Attorneys for Plaintiff Grikavicius

8
9 Dated: November 16, 2011

HOFFMAN & LAZEAR

11 /s/Chad A. Saunders

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180 Grand Avenue, Suite 1550
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Attorney for Plaintiff Lourdes R. Landeros

16
17 Dated: November 16, 2011

MORRIS and ASSOCIATES

19 /s/Stephen B. Morris

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San Diego, CA 92101

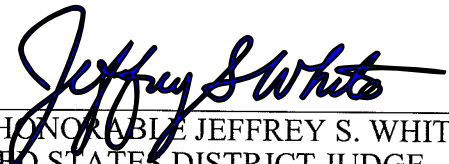
Attorney for Plaintiff Tina Bauer

~~PROPOSED~~ ORDER

Based on the foregoing, and good cause appearing, **IT IS HEREBY ORDERED** that:
 as case no. 11-01919 JSW
 (1) the above-referenced actions shall be consolidated for all purposes, (2) Plaintiffs shall file a
 consolidated complaint on or before December 9, 2011, (3) Stonebarger Law, APC, and Westrup
 Klick LLP, shall serve as Co-Lead Plaintiffs' Counsel in the above-referenced consolidated
 actions, and shall be responsible for directing work to be performed by Plaintiffs' counsel on
 behalf of the putative class, for the preparation of any documents to be filed with the Court, and
 for communications with the Court and Defense Counsel, and (4) this stipulation shall not alter
 the time within which the parties shall make their initial disclosures or respond to discovery
 requests that were propounded prior to entry of this order.

IT IS SO ORDERED.

Dated: November 28, 2011


 THE HONORABLE JEFFREY S. WHITE
 UNITED STATES DISTRICT JUDGE